

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Eric Edmon

Case No. 25-mj-30166

USA v. Sealed Matter (jo)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 15, 2020 - July 14, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire fraud
18 U.S.C. § 1028A	Aggravated identity theft

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 20, 2025

City and state: Detroit, MI



Complainant's signature

Miguel Colon, Special Agent

Printed name and title



Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Miguel A. Colon, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the U.S. Department of Labor, Office of Inspector General, Office of Investigations - Labor Racketeering and Fraud (“DOL-OIG/OI-LRF”) and have been since December 2017. I am currently assigned to the Federal Bureau of Investigation (“FBI”) Violent Gang Task Force (“VGTF”) where I participate in investigations of street gangs committing various violations of federal law, including weapons and narcotics trafficking, violent crimes, and fraud. Prior to my current assignment, I was assigned to the Homeland Security Investigations’ Document and Benefit Fraud Task Force, where I investigated criminal activity including, but not limited to, identity theft, money laundering, visa fraud, and other financial fraud. I have conducted numerous investigations involving identity theft, labor, financial and unemployment insurance fraud schemes. In addition to my experience, I have also received significant law enforcement training, including graduating from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center.

2. As a Special Agent, I have conducted numerous investigations into criminal violations of both Title 29 and Title 18 of the United States Code. During this time, I have been either the lead agent or supporting agent on several

investigations involving criminal schemes targeting the unemployment insurance (“UI”) program through the filing of false or fictitious UI claims. Based on my direct personal experience with these cases, I have become familiar with the methods that criminals use to attack and exploit the UI systems as well as the criminals’ reliance on the use of email and other internet or online tools and systems to facilitate that fraud.

3. Probable cause exists that Eric EDMON (DOB: XX-XX-2002) has engaged in an unemployment insurance fraud scheme and has committed wire fraud (18 U.S.C. § 1343) and aggravated identity theft (18 U.S.C. § 1028A). His scheme involved the filing of fraudulent UI claims through the internet, with some of those claims using misappropriated personal identifying information (“PII”) of real persons and having fraudulently obtained funds deposited into accounts in his control. In other instances, EDMON fraudulently obtained UI funds using UI debit cards that were mailed to his residence in the Eastern District of Michigan. A DOL-OIG query revealed approximately 146 UI claims filed using his residence. A review of those claims also revealed additional fraud indicators such as repeated bank accounts registered in EDMON’s name and the use of two specific Google email accounts listed on 56 of the 146 UI claims, which were identified as linked to EDMON. Also, on 58 of the 146 UI claims I identified a phone number linked to EDMON through a search of EDMON’s emails, referenced in more detail below.

4. I make this affidavit based upon personal involvement in the subject criminal investigation, including review of: financial, employment, internet service provider, utility, and property records; records from relevant state agencies regarding UI claims; law enforcement surveillance; and information and evidence obtained from search warrants in this investigation. I have also been provided information from other law enforcement agents and officials from the FBI, the Detroit Police Department (DPD), and various State Workforce Agencies. This affidavit does not contain all the facts developed to date in the underlying investigation. It is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant.

BACKGROUND ON UNEMPLOYMENT INSURANCE

5. The Social Security Act of 1935 initiated the federal and state Unemployment Insurance system. The system provides benefits to individuals who are unemployed for reasons beyond their control. The purpose of the Unemployment Insurance system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. The U.S. Department of Labor funds many Unemployment Insurance Agency administrative costs, including salaries, office expenses, and computer equipment. The various state unemployment insurance agencies

responsible for administering the UI programs are commonly referred to as State Workforce Agencies (“SWA”).

6. State unemployment systems and benefits are joint state and federal enterprises largely financed by taxes on private employers located in that state. In 2020 and 2021, the federal government provided significant supplemental benefits to the states as a result of the COVID-19 pandemic. Beginning in or about March 2020 and continuing through September 4, 2021, the Families First Coronavirus Response Act; Coronavirus Aid, Relief, and Economic Security Act; and the American Rescue Plan Act of 2021 created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic need for unemployment benefits by the American workforce. Collectively, these benefits are often referred to as Pandemic Unemployment Assistance (“PUA”).

7. Normally (in the absence of fraud), an unemployed worker initiates an Unemployment Insurance claim. This can be accomplished by submitting a claim in person, over the telephone, or via the Internet. Currently, most Unemployment Insurance claims are filed online via the Internet through the states’ UI portal. When a claimant using an internet protocol (“IP”) address registered in Michigan files a claim with an out-of-state UI agency, the servers used to process those claims are located outside the state of Michigan. For example, an Arizona or California UI

claim filed from an IP address registered to a Michigan residence will be processed through a server located outside of the state of Michigan.

8. To be eligible for Unemployment Insurance benefits, the worker must demonstrate a certain level of earnings in several quarters immediately preceding the application. The amount of benefits that an Unemployment Insurance claimant might be eligible for depends on a variety of factors, including but not limited to the length of his or her previous employment and the amount of wages he or she earned.

9. The State Workforce Agency will either approve or reject an Unemployment Insurance claim based on the application made by the unemployed worker. If the respective SWA approves an Unemployment Insurance claim, the claimant is required to re-certify the claim via telephone or Internet at various times during the life of the claim. The worker must also certify that he or she is still unemployed and actively seeking work. One way in which unemployment benefits are provided to a claimant is with a UI debit card, issued by the financial institution contracted by the respective state, which is mailed to the claimant through the U.S. Postal Service.

10. Alternatively, a claimant can provide the state Unemployment Insurance Agency with a bank routing number and bank account number so his or her Unemployment Insurance benefits can be transferred via electronic funds

transfers (“EFTs”) into his or her bank account. All EFTs of Unemployment Insurance benefits to Unemployment Insurance claimants involve the transmission of electronic signals through the various SWA and financial institution data servers. For example, all EFTs of Unemployment Insurance benefits to Michigan, California or Arizona Unemployment Insurance claimants, whether via a Bank of America (BOA)-provided debit card or via a claimant-provided bank account, involve the transmission of electronic signals through one of BOA’s two data centers, which are located in Virginia and Colorado, and from those data centers to banks and/or ATMs located, for example, in Michigan. In addition, any other state that disperses Unemployment Insurance benefits using BOA prepaid debit cards, including Arizona and California, also involve the transmission of electronic signals through the aforementioned BOA data centers. These are interstate wire communications.

PROBABLE CAUSE

11. The United States Attorney’s Office (USAO), FBI, DPD, and DOL-OIG have been investigating criminal activity conducted by members and associates of the Detroit street gang, “Always On Go,” more commonly known as “264 Gang.” As part of the investigation, I identified members of 264 Gang, associates, and others, who appeared to be engaged in UI fraud or other financial fraud schemes. During the investigation, I determined that EDMON was associated with at least 180 suspected fraudulent UI claims in 36 different states between

March 15, 2020, and July 14, 2021. To date, EDMON is associated with over \$516,237 in UI benefits fraud.

12. I identified an address, 196XX Woodmont St., Harper Woods, MI, responsible for submitting approximately 146 UI claims in 122 unique individuals' names and Social Security Numbers ("SSNs") in 33 different states. I know from my training and my experience in other UI fraud investigations that a large volume of claims from a single residential address with numerous unique individuals' names and SSNs is indicative of fraudulent UI claims. A law enforcement database revealed that 196XX Woodmont St., Harper Woods, MI, is the address listed on EDMON's Michigan driver's license.

13. Agents reviewed the email addresses, bank accounts, and claimant phone numbers associated with the UI claims associated with address 196XX Woodmont St., Harper Woods, MI. Agents found numerous commonalities among the claims, which are strong indicators of fraud. For instance, phone number 313-XXX-1151 was listed in 58 of the 146 UI claims associated with 196XX Woodmont St. Bank accounts were also used multiple times between claims. For instance, Michigan First Credit Union account ending in 8622 was used on nine separate UI claims. A separate Fifth Third Bank account ending in 3241 was used in nine separate UI claims.

14. Agents also reviewed commonalities in the email addresses registered with the claims filed using address 196XX Woodmont St., Harper Woods, MI. For instance, 116 out of the 146 UI claims used the repeated numerical pattern “3717” in the email addresses. Although investigating agents cannot state the exact statistical likelihood that this is a random coincidence, common judgement suggests a particular individual or particular group of individuals is responsible for the creation and utilization of the UI claims in question. Further review identified two specific email addresses, “wavy3717@gmail.com” and “wavyej3717@gmail.com”, used to file 56 of the 146 UI claims. Federal search warrants for “wavy3717@gmail.com” and wavyej3717@gmail.com revealed that both accounts are associated with EDMON. Paragraphs 43-45 provide a detailed explanation.

15. Based on my training and my experience with fraud and identity theft schemes targeting state UI agencies, I know that the filing of 146 distinct claims from one residential address, with claims within that population having repeated phone numbers, email addresses and repeat bank accounts are strong indicators of an identity theft and unemployment insurance fraud scheme.

UI Claims Associated with EDMON

UI Claim in E.K.’s Name

16. On March 15, 2020, a North Carolina UI claim was filed in the name of E.K., a real person whose identity is known to agents but withheld for privacy.

The email address listed on the claim was “wavy3717@gmail.com”. The bank account listed on the claim for the disbursement of UI claims was Michigan First Credit Union (MFCU) ending in 8622.

17. Records provided by MFCU, which I have reviewed, revealed the accountholder listed on account ending 8622 was Eric EDMON. The accountholder address listed on the account was 196XX Woodmont St., Harper Woods, MI.

UI Claim in A.J.’s Name

18. On May 11, 2020, a Michigan UI claim was filed in the name of A.J., a real person. The email address listed on the claim was “wavyej3717@gmail.com”. The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON’s name.

UI Claim in EDMON’s Name

19. On June 1, 2020, a Delaware UI claim was filed in the name of Eric EDMON but using the SSN of another individual. The email address listed on the claim was “wavyej3717@gmail.com.” The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON’s name.

20. On June 1, 2020, an Arizona UI claim was filed in the name of Eric EDMON but using the SSN of another individual. The email address listed on the claim was “wavyej3717@gmail.com.” The bank account listed on the claim for the

disbursement of UI claims was MFCU ending in 8622, registered in EDMON's name.

UI Claim in R.S.'s Name

21. On June 10, 2020, a Maryland UI claim was filed in the name of R.S., a real person. The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON's Michigan driver's license.

22. On or around June 23, 2020, a BOA UI debit card ending 9393 in R.S.'s name was mailed, via the United States Postal Service (USPS), to 196XX Woodmont St., Harper Woods, MI. On June 23, 2020, \$9,270 was deposited into the debit account, established by the Maryland Department of Labor, in R.S.'s name.

23. BOA provided agents with account transaction information pertaining to the UI debit card ending in 9393 in R.S.'s name. Records revealed various transactions in the Eastern District of Michigan. In addition, the records revealed a transaction on July 6, 2020, with Uber, a transportation company that provides rideshare service primarily via a cell phone application. Records provided by Uber, which I have reviewed, revealed the UI debit card ending in 9393 was linked to an Uber profile in the name of Eric EDMON.

24. On February 28, 2024, I interviewed R.S., who stated s/he was a victim of identity theft. R.S. stated s/he did not file a UI claim in Maryland, had not received

any UI benefits, and did not give permission to anyone to file a UI claim on his/her behalf.

25. Probable cause exists that EDMON committed wire fraud and aggravated identity theft in connection with the fraudulent UI claim filed in R.S.'s name, and his fraudulent use of a UI debit card in R.S.'s name (that was sent through the mail). The filing of the claim involved an interstate wire transmission as it was filed via the internet with the Maryland Department of Labor, an agency located outside of Michigan. A UI debit card for that fraudulent claim was then mailed, via the U.S.P.S., to an address in the Eastern District of Michigan, which EDMON used in the Eastern District of Michigan, which in turn involved interstate wire transmissions with BOA servers located in Virginia or Colorado.

UI Claim in E.K.'s Name

26. On July 17, 2020, a Maine UI claim was filed in the name of E.K., a real person. The phone number listed on the claim was 313-XXX-1151. The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON's Michigan driver's license. The email address listed on the claim was "wavyej3717@gmail.com." The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON's name.

27. Transaction records provided by MFCU for account ending in 8622 revealed various deposits from the Maine Department of Labor into EDMON's account.

28. On February 28, 2024, I interviewed E.K., who stated s/he was a victim of identity theft. E.K. stated s/he did not file a UI claim in Maine, had not received any UI benefits, and did not give permission to anyone to file a UI claim on his/her behalf.

29. Probable cause exists that EDMON committed wire fraud and aggravated identity theft in connection with the fraudulent UI claim filed in E.K.'s name. The filing of the claim involved an interstate wire transmission as it was filed via the internet with the Maine Department of Labor, an agency located outside of Michigan.

UI Claim in H.S.'s Name

30. On August 10, 2020, a Kansas UI claim was filed in the name of H.S., a real person. The phone number listed on the claim was 313-XXX-1151. The email address listed on the claim was "wavyej3717@gmail.com." The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON's Michigan driver's license. The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON's name.

UI Claim in B.S.'s Name

31. On October 7, 2020, a Colorado UI claim was filed in the name of B.S., a real person. The phone number listed on the claim was 313-XXX-1151. The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON's Michigan driver's license. The email address listed on the claim was "wavyej3717@gmail.com." The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON's name.

UI Claim in J.W.'s Name

32. On October 13, 2020, a Washington D.C. UI claim was filed in the name of J.W., a real person. The email address listed on the claim was "wavyej3717@gmail.com." The bank account listed on the claim for the disbursement of UI claims was MFCU ending in 8622, registered in EDMON's name.

33. A DOL-OIG database revealed MFCU account ending in 8622, registered in EDMON's name, was listed on 19 separate UI claims in 14 separate states.

UI Claim in D.K.'s Name

34. On May 28, 2020, an Idaho UI claim was filed in the name of D.K. but using the SSN of another individual. The email address listed on the claim was

“wavyej3717@gmail.com.” The bank account listed on the claim for the disbursement of UI claims was Fifth Third Bank ending in 3241.

35. Records provided by Fifth Third Bank, which I have reviewed, revealed the accountholder listed on account ending 3241 was Eric EDMON. The accountholder address listed on the account was 196XX Woodmont St., Harper Woods, MI, the address listed on EDMON’s Michigan driver’s license.

UI Claim in E.S.’s Name

36. On August 1, 2020, a Kansas UI claim was filed in the name of E.S., a real person. The phone number listed on the claim was 313-XXX-1151. The email address listed on the claim was “wavyej3717@gmail.com.” The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON’s Michigan driver’s license. The bank account listed on the claim for the disbursement of UI claims was Fifth Third Bank ending in 3241, registered in EDMON’s name.

UI Claim in T.S.’s Name

37. On August 16, 2020, a Kentucky UI claim was filed in the name of T.S., a real person. The phone number listed on the claim was 313-XXX-1151. The email address listed on the claim was “wavy3717@gmail.com.” The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI, the same address listed on EDMON’s Michigan driver’s license. The bank account listed on the claim

for the disbursement of UI claims was Fifth Third Bank ending in 3241, registered in EDMON's name.

38. A DOL-OIG database revealed Fifth Third Bank account ending in 3241, registered in EDMON's name, was listed on 10 separate UI claims in nine separate states.

UI Claim in C.K.'s Name

39. On August 27, 2020, a California UI claim was filed in the name of C.K., a real person. The phone number listed on the claim was 313-XXX-1151. The claimant address listed on the claim was 196XX Woodmont St., Harper Woods, MI.

40. On or around August 28, 2020, a BOA UI debit card ending in 7285 in C.K.'s name was mailed, via USPS, to 196XX Woodmont St., Harper Woods, MI. Between August 28, 2020, and September 4, 2020, \$21,000 was deposited into the debit account, established by the California Employment Development Department, in C.K.'s name.

41. Transaction records provided by BOA, which I have reviewed, revealed a \$5,000 funds transfer on September 4, 2020, from the account associated with UI debit card ending in 7285 to Fifth Third Bank account ending in 3241, registered in EDMON's name. In addition, Fifth Third Bank deposit records for EDMON's account ending in 3241 revealed a deposit on September 8, 2020, from a BOA account in the name of C.K. in the amount of \$5,000.

42. On March 19, 2024, I interviewed C.K., who stated s/he was a victim of identity theft. C.K. stated s/he did not file a UI claim in California, had not received any UI benefits, and did not give permission to anyone to file a UI claim on his/her behalf.

Google Email Addresses

43. On February 26, 2024, United States Magistrate Judge David Grand authorized the search of Google email addresses “wavy3717@gmail.com” and “wavyej3717@gmail.com” for evidence of fraud.

44. Records provided by Google for email address “wavy3717@gmail.com” revealed that the subscriber name on the account was “Eric Jr.” A review of the emails for account “wavy3717@gmail.com” revealed over 115 emails from 15 different state UI agencies. Further review of the emails indicated that email account “wavy3717@gmail.com” was also used for personal use by EDMON. For instance, agents found an email from Delta Airlines on May 28, 2020, which provided confirmation and passenger information in the name of “ERIC DARYLE EDMON.” Agents also found an October 6, 2020, email from the Michigan Secretary of State confirming an appointment to obtain a replacement ID in Warren, MI. The phone number listed on the Michigan Secretary of State appointment for EDMON was 313-XXX-1151, referenced above as being

associated with significant UI fraud. Agents also found emails to EDMON from family members, further indicating it was an email used by EDMON.

45. Google also provided information and emails pertaining to email address “wavyej3717@gmail.com.” A review of the emails for account “wavyej3717@gmail.com” revealed over 130 emails from 24 different state UI agencies. A further review of the emails indicated that email account “wavyej3717@gmail.com” was also used for personal use by EDMON. For instance, agents found a July 21, 2020, email from Spirit Airlines to EDMON providing confirmation and travel information for EDMON. The email also displayed contact information for EDMON which listed address 196XX Woodmont St., Harper Woods, MI and phone number 313-XXX-1151. Agents also found a July 14, 2021, email from Fifth Third Bank to EDMON pertaining to his account ending in 3241, referenced above as associated with UI fraud.

CONCLUSION

46. Based on the forgoing, there is probable cause to believe that Eric EDMON has committed wire fraud (18 U.S.C. § 1343) and aggravated identity theft (18 U.S.C. § 1028A) in connection with a scheme to defraud the federal/state unemployment insurance programs and obtain unemployment benefits by means of false and fraudulent pretenses and representations.

Respectfully submitted,



Miguel A. Colon, Special Agent
U.S. Department of Labor
Office of Inspector General

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: March 20, 2025